

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

AMERICAN EMPLOYERS' INSURANCE	:	
COMPANY, as subrogee of College Book	:	
Stores of America	:	C.A. No. 05-63-SLR
One Beacon Street	:	
Boston, MA 02108	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
T.A. RIETDORF & SONS, INC.	:	
P.O. Box 1528	:	
Wilmington, DE 19899	:	
	:	
Defendant.	:	

**JOINT MOTION AND STIPULATION FOR EXTENSION OF TIME IN WHICH TO  
RESPOND TO DEFENDANT'S MOTION TO DISMISS**

Plaintiff, American Employers' Insurance Company, as subrogee of College Book Stores of America, hereby moves this Honorable Court for an Extension of Time in Which to Respond to Defendant's Motion to Dismiss and in support of their Motion avers as follows:

1. On or about May 12, 2005, Plaintiff was served with a copy of Defendant's Motion for Summary Judgment in this case.
2. Pursuant to the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the District of Delaware, Plaintiff's Response to the Motion to Dismiss is due on or before May 23, 2005.
3. Counsel for Defendant has consented to providing Plaintiff with an extension of time to respond to its Motion until May 31, 2005.
4. Plaintiff respectfully requests that this Court extend the time for the filing of Plaintiff's Response to Defendant's Motion to Dismiss from May 23, 2005 up to and including May 31, 2005.

4. Plaintiff respectfully requests that this Court extend the time for the filing of Plaintiff's Response to Defendant's Motion to Dismiss from May 23, 2005 up to and including May 31, 2005.

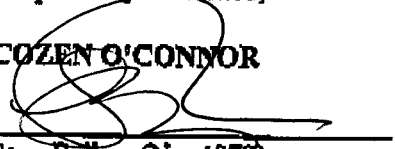
WHEREFORE, Plaintiff, American Employers' Insurance Company, as subrogee of College Book Stores of America, respectfully request that this Court extend the time for the filing of Plaintiff's Response to Defendant's Motion to Dismiss from May 23, 2005 up to and including May 31, 2005.

DATED: May 20, 2005

Respectfully submitted,

**COZEN O'CONNOR**

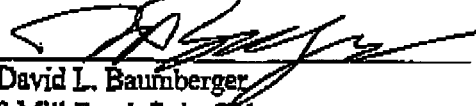
BY:

  
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Attorneys for Plaintiff

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